

FILED

IN THE UNITED STATES DISTRICT COURT

MAR 06 2019

WESTERN DIVISION OF TEXAS

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY CLERK

WACO DIVISION

RODRICK EUGENE HARRIS

CASE NO. W19CA195

V.S.

JURY TRIAL DEMANDED

SOUTHWESTERN CORRECTIONS

D.B.A.

LASALLE CORRECTIONS

**LT. BRIAN BLANCHARD, SGT. MICHAEL WAGNER, & UNKNOWN
OFFICERS**

LASALLE CORRECTIONS MEDICAL DEPT.

UNKNOWN NURSES

CIVIL RIGHTS COMPLIANT

JURISDICTION

1.

THIS is a Civil Rights Compliant made pursuant to Title 42 USC Sections 1983, 1985 & 1986. This Honorable Court has jurisdiction over this case pursuant to Title 28 USC Sections 1331 & 1343 (a). This Honorable Court can also exercise supplemental jurisdiction under Title 28 USC Section 1376, & provide in this case declaratory relief pursuant to Title 28 USC Sections 2201 & 2202.

VENUE

2.

AT all pertinent times the contours of the Plaintiffs Complaint giving cause to this action occurred in the Waco, Texas McLennan County, & this Honorable Court is the appropriate venue pursuant Title 28 USC Section 1391.

EXHAUSTION

3.

EXHAUSTION requirements have not been pursued by the Plaintiff in this Civil Action because of fear of retaliation in this Civil Action because of the fear of retaliation for exercising his Constitutional Rights.

PARTIES

4.

ALL parties are named in their official & individual capacities.

**A.) SOUTHWESTERN CORRECTIONS - D.B.A. LASALLE CORRECTIONS
3101 EAST MARLIN HIGHWAY, WACO TEXAS 76705**

FAILS to implement policy & practice that prevents its agents from violating both State & Federal Constitutional Due Course, Due Process of Law mandates afforded to pretrial detainees that protect against agents of LASALLE being deliberately indifferent, & or grossly negligent to the medical needs of detainees & prevent unprovoked acts of sadistic acts of brutality.

B.) LT. BRIAN BLANCHARD had SGT. MICHAEL WAGNER, 3101 EAST MARLIN HIGHWAY WACO, TEXAS 76705 & Unknown Officers commit a malicious act of unprovoked brutality against RODRICK EUGENE HARRIS, & then committed acts of being deliberately indifferent, & or grossly negligent to Plaintiff medical needs.

**C.) UNKNOWN NURSES LASALLE CORRECTIONS MEDICAL
DEPARTMENT, 3101 EAST MARLIN HIGHWAY WACO, TEXAS 76705
Committed acts of being deliberately indifferent & or grossly negligent**

to the medical needs of RODRICK EUGENE HARRIS, & fails to implement practices that prevent being deliberately indifferent, & or grossly negligent to the medical needs of pretrial detainees while operating, & or acting in the capacity of providing medical care for detainees.

EVENTS

5.

ON JANUARY 1ST 2019 a few minutes before 6 pm shift change, **LT. BRIAN BLANCHARD** had the Plaintiff brought in to the **LT. OFFICE** for a case. Despite a unbiased Officer as a witness **LT. BRIAN BLANCHARD** who the Plaintiff had been previously placed in seg for assaulting, decided to have the Plaintiff placed back in segregation. **LT. BRIAN BLANCHARD** had one of the several officers in the office turn on the camera & began recording when the Plaintiff began trying to leave the office to remove him self from the situation.

AFTER heated words with the multiple Officers the Plaintiff peacefully submitted to being handcuffed. Once in the main hallway in front of the **SGT DESK** the Plaintiff saw over 20 officers watching the whole ordeal. **SGT. MICHAEL WAGNER** took advantage of this opportunity to silence the Plaintiff, & attacked him while he was being escorted to seg.

THE unprovoked attack resulted in Plaintiff Right Eye being blackened, & a black mark now residing under said eye from **SGT. MICHAEL WAGNER** repeated elbow to the face while Plaintiff was securely held on the ground. **SGT. MICHAEL WAGNER** elbows to the Plaintiff face broke his gold & brown **BURBERRY** glasses, all the while the ordeal was being recorded & witnessed by multiple officers.

ONCE placed in **N-607** Plaintiff was stripped searched & had refused any more dealings with the members of the **LASALLE CORRCETIONS**. Later the very night Plaintiff requested that the Control Officer **O. BOHANNON** help him get medical attention because he was coughing up blood & had a lump under his right eye. Officer **O. BOHANNON** notified the ranked officials of the Plaintiff situation, but he was denied

medical treatment by the members of LASALLE CORRECTIONS to this very day.

CLAIMS

6.

1.) CLAIM ONE: DEFENDANT LASALLE violated the Plaintiffs 14th Amendment to the UNITED STATES CONSTITUTION by failing to implement policy & or practices within its facilities that prevents its agents from being grossly negligent , or deliberately indiffrent to & or grossly negligent to the medical need of pretrial detainees housed within its facilities.

2.) CLAIM TWO: DEFENDANT LASALLE violated the Plaintiffs 14th amendment to the UNITED STATES CONSTITUTION by failing to implement policy & or practicies within its facilities that prevents its agents from being grossly negligent, or deliberately indiffrent to the medical needs of pretrial detainees housed within its facilities.

3.) CLAIM THREE: DEFENDANT LASALLE & AGENTS violated the Plaintiffs 14th Amendment to the UNITED STATES CONSTITUTION when these Defendants were deliberately indiffrent to the Plaintiffs medical need in question suffered in the recorded attack.

RELIEF REQUESTED

7.

PLANTIFF seeks declaratory judgements againts all the DEFENDANTS known & unknown as parties in this action.

PLANTIFF seeks damages in the amount of \$ 4,000,000.00 for the emotional, mental physical & psychological harm suffered.

PLANTIFF also seeks compensation for filing fees, court cost, & attorney fees, as well as punitive damages in the amount deemed appropriate ba a jury, but a sum beginning at \$ 2,000,000.00

I, the undersigned Plaintiff, RODRICK EUGENE HARRIS, hereby certify,

verify & state under the penalty of perjury that the foregoing is true & correct pursuant to Title 28 USC Section 1746.

EXECUTED ON THIS _____ DAY OF FEBRUARY 2019

RESPECTFULLY SUBMITTED,

PRO-SE DEFENDANT

RODRICK E. HARRIS

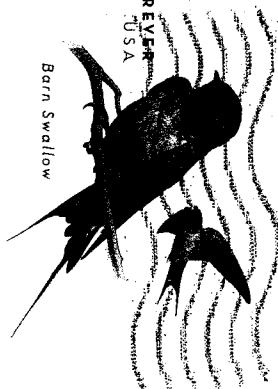
3101 E. Marlin Hwy #89712

Waco, TX 76705

x Rodrick E. Harris
Signature

ROBERT A. WATZLA DE #1446996
8101 East WAZZLA Hwy
Waco TX 76705

NORTH TEXAS TX PSDC
DALLAS TX 750
04 MAR 2019 PM 6:10
FOREVER
USA



Barn Swallow

Clerk U.S. Dist. Court
800 Franklin Ave. Room 380
Waco TX 76701

76701-153460

